1 District Judge James L. Robart 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 RANJANI RAVI LNU, et al., No. 2:25-cv-330-JLR STIPULATED MOTION TO HOLD 10 Plaintiffs, CASE IN ABEYANCE AND [PROPOSED] ORDER 11 v. 12 UNITED STATES OF AMERICA, et al., Noted for: April 23, 2025 13 Defendants. 14 15 For good cause, Plaintiffs and Defendants, by and through their counsel of record, pursuant 16 to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate 17 and move to stay these proceedings until September 15, 2025. Plaintiffs brought this litigation 18 pursuant to the Administrative Procedure Act and Mandamus Act seeking, inter alia, to compel 19 Defendants to adjudicate Plaintiffs' Form I-485, Application to Register Permanent Residence or 20 Adjust Status. Defendants' response to the Complaint is currently due on April 25, 2025. 21 Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706 22 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to control 23 the disposition of the causes on its docket with economy of time and effort for itself, for counsel,

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and for litigants." Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also Fed. R. Civ. P. 1. With additional time, this case may be resolved without the need of further judicial intervention. U.S. Citizenship and Immigration Services ("USCIS") has indicated that it is reviewing Plaintiffs' Form I-485 applications and may be able to be issue a final decision shortly. Therefore, the parties believe good cause exists to stay these proceedings to save the parties and this Court from spending unnecessary time and judicial resources on this matter. Accordingly, the parties request that the Court hold the case, including all interim deadlines, in abeyance until September 15, 2025. If this case is not resolved, the parties will submit a proposed briefing schedule by September 15, 2025. 10 Dated: April 23, 2025 Respectfully submitted, 12 s/ Jennifer Nimer TEAL LUTHY MILLER JENNIFER NIMER (61962) Acting United States Attorney Nimer Law LLC 13 6500 Emerald Parkway, Suite 100 s/Kristen R. Vogel Dublin, Ohio 43016 KRISTEN R. VOGEL (NY NO. 519664) 14 Phone: 614-927-0550 **Assistant United States Attorney** 15 Email: jnimer@nimerlaw.com United States Attorney's Office 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 16 s/Ronen Sarraf RONEN SARRAF (Admitted pro hac vice) Phone: 206-553-7970 Sarraf Gentile LLP Email: Kristen.Vogel@usdoj.gov 17 10 Bond Street, Suite 212 18 Great Neck, New York 11021 Attorneys for Defendants Phone: 516-699-8890 Email: ronen@sarrafgentile.com 19 20 Attorneys for Plaintiffs I certify that this memorandum contains 262 words, in compliance with the Local Civil Rules. 22 23

STIPULATED MOTION FOR ABEYANCE Case No. 2:25-cv-330-JLR

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[PROPOSED] ORDER

The case, including all interim deadlines, is held in abeyance until September 15, 2025. The parties shall submit a status report on or before September 15, 2025. It is so **ORDERED**.

DATED this 24th day of April, 2025.

JAMES L. ROBART

United States District Judge

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